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Attorney for Debtor

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF ARIZONA

In re	)	In Proceeding Under
	)	Chapter 11
Jason Ronald Roggensee	)	
	)	Case No. 08-07826 RJH
	)	
Debtor.	)	
	)	Adv. No. 10-00411 RJH
	)	
Jason Ronald Roggensee	)	APPLICATION FOR ENTRY OF
	)	DEFAULT
Plaintiff.	)	
	)	(Re: 4376 South Hemet Street
v.	)	Gilbert, AZ)
	)	
Countrywide Home Loans, Inc.	)	
and/or its Assignee or Successor	)	
Real Time Solutions, Inc.	)	
	)	
Defendants.	)	
	)	

Comes now the Plaintiff, Jason Ronald Roggensee, by and through counsel, Allan C. NewDelman, P.C. and state the following:

1.

This adversary action was opened with the filing of a Complaint to Determine the Validity, Priority or Interest in Property was filed against the Defendants, Countrywide Home

1 Loans, Inc. and/or its Assignee or Successor, Real Time Solutions, Inc. on March 16, 2010.

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3 2.

4 A summons was issued to the Defendants by the Clerk of the Court on March 17, 2010  
5 and immediately served upon the Defendants (See Docket No. 5) on March 17, 2010.

6 3.

7 The deadline to respond to the Summons was April 17, 2010. No timely response has  
8 been filed either by the Defendants or on the Defendants' behalf.

9 4.

10 As a result of the Defendant's failure to file a timely response to the Complaint, Plaintiff  
11 moves the Clerk of the Court for an entry of default against the Defendants.

12 5.

13 Defendants are a corporation and not in the military service.

14 Respectfully submitted this 24<sup>th</sup> day of June, 2010.

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18 /s/ Allan D. NewDelman

19 Allan D. NewDelman  
20 Counsel for the Plaintiff  
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1 A copy of the foregoing  
2 mailed this 24<sup>th</sup> day  
3 of June, 2010, to:

4 Countrywide Home Loans Bank  
5 c/o CT Corporation System  
6 2394 East Camelback Road  
7 Phoenix, AZ 85016

8 Real Time Solutions, Inc.  
9 1750 Regal Row  
10 Suite 120  
11 P.O. Box 36655  
12 Dallas, TX 75235

13 Jason Ronald Roggensee  
14 2721 East Tamarisk St  
15 Gilbert, AZ 85296  
16 Debtor

17 /s/ R. Scott Graves  
18 R. Scott Graves  
19 Paralegal  
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